

REMARKS

Claims 91-102, 105 and 106 are pending in this application. Claims 1-90 and 113 have been canceled without prejudice or disclaimer. Claims 103, 104 and 107-112 have been withdrawn by the Examiner as being drawn to non-elected subject matter. Claims 91, 96 and 105 have been amended.

Applicants, by canceling or amending any claims herein, make no admission as to the validity of any rejection made by the Examiner against any of these claims. Applicants reserve the right to reassert any of the claims canceled herein or the original claim scope of any claim amended herein, in a continuing application.

Independent claim 91 has been amended to recite “[a] composition comprising an activated citrus peel extract (ACPE), said ACPE prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hour old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract; wherein said ACPE comprises at least one of the following: oligosaccharides, short peptides, flavonoid glycosides, fatty acids, and triglycerides.” Support for claim 91, as amended, can be found throughout the specification and claims as originally filed. Claims 92-95 depend, either directly or indirectly, from claim 91.

Independent claim 96 has been amended to recite “[a] dermatological composition comprising: (i) an activated citrus peel extract (ACPE) comprising 55% oligosaccharides,

5% short peptides, 20% flavonoid glycosides, 10% fatty acids and 10% triglycerides and (ii) a dermatologically acceptable carrier, excipient or diluent; wherein said ACPE is prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hours old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract."

Support for claim 96, as amended, can be found throughout the specification and claims as originally filed. Claims 97-102 depend, either directly or indirectly, from claim 96.

Independent claim 105 has been amended to recite "[a] composition for use in preserving foods, beverages and cosmetics, said composition comprises an activated citrus peel extract (ACPE), said ACPE comprising at least one or a combination of the following: oligosaccharides, short peptides, flavonoid glycosides, fatty acids, and triglycerides; wherein said ACPE is prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hours old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract." Support for claim 105, as amended, can be found throughout the specification and claims as originally filed. Claim 106 depends, either directly or indirectly, from claim 105.

No new matter has been added.

In view of the remarks set forth below, further and favorable consideration is respectfully requested.

I. At page 2 of the Official Action, claim 113 has been rejected under 35 U.S.C. § 112, second paragraph.

The Examiner has rejected claim 113 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claim 113 has been canceled, therefore rendering the rejection of this claim moot.

II. At page 3 of the Official Action, claim 113 has been objected to due to informalities.

The Examiner asserts that claim 113 is in improper form because the claim depends on a non-elected claim.

Claim 113 has been canceled, therefore rendering the objection of this claim moot.

III. At page 3 of the Official Action, claims 91, 92, 94, 95, and 105 have been rejected under 35 USC § 102(b) as being anticipated by IL 120929.

The Examiner has rejected claims 91, 92, 94, 95, and 105 under 35 U.S.C. § 102 as being anticipated by IL 120929 (hereafter “the IL reference”). The Examiner asserts that the IL reference describes each and every element of claims 91, 92, 94, 95, and

105.

In view of the remarks set forth herein, this rejection is respectfully traversed.

The test for anticipation is whether each and every element as set forth is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP § 2131. The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989); MPEP § 2131. The elements must also be arranged as required by the claim. *In re Bond*, 15 USPQ2d 1566 (Fed. Cir. 1990).

Claim 91 is directed to a composition comprising an activated citrus peel extract (ACPE), said ACPE prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hour old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract; wherein said ACPE comprises at least one of the following: oligosaccharides, short peptides, flavonoid glycosides, fatty acids, and triglycerides. Claims 92-95 depend, either directly or indirectly, from claim 91.

Similarly, independent claim 105 is directed to a composition for use in preserving foods, beverages and cosmetics, said composition comprises an activated citrus peel extract (ACPE), said ACPE comprising at least one or a combination of the following: oligosaccharides, short peptides, flavonoid glycosides, fatty acids, and

triglycerides; wherein said ACPE is prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hours old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. Claim 106 depends directly from claim 105.

Both claim 91 and 105 contain similar process steps for preparing ACPE that contained in the compositions of the presently pending claims.

In contrast, the IL reference describes the production of antifungal and antimicrobial substances for medical and agricultural uses, comprising applying plant fungal or bacterial pathogens to citrus fruit peels, incubating the citrus peels and extracting the treated peel to obtain a liquid enriched in antifungal and antimicrobial substances. See the IL reference at the abstract.

However, unlike the presently claimed subject matter, the IL reference does not teach the step of filtering the extract liquid, as presently claimed. More specifically, the IL reference does not teach filtering the aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. Accordingly, Applicants submit that the IL reference does not teach each and every element of the presently claimed subject matter.

In addition, Applicants note that it would be apparent to a person of ordinary skill in the art of synthetic chemistry, or in the art of preparation or isolation of natural

products, that two overall different multi-step processes having a common step would not necessarily (and in most cases will not) produce an identical end result. In fact, in more cases the differences between the end products would stem from the elements or steps of the processes which are different. Similarly, it is possible to apply two processes which differ by a single step and obtain two completely different end products.

The process of the IL reference and that of claim 91 of the present application make use of “*exposure of citrus peels to at least one pathogen*;” however, the two processes are different. In addition, the two processes produce different products, which have, for example, different activities. The activity of the extract obtained by the method of the present invention (referred to in the specification and herein as ACPE) is greater than the activity of the extract of IL reference. While the activity of the extract of IL reference was exemplified *in vitro*, its use or application in various formulations (suitable, for example, for human applications) has proven difficult for various reasons. Accordingly, Applicants have attempted to improve or perfect the method of extracting ACPE by altering the process steps of extracting ACPE in order to obtain a more effective extract that would produce more effective compositions.

One of the methods which was found beneficial in producing a more effective extract is the method recited in presently pending claim 91. The method recites a filtration step, such as ultrafiltration. It should be noted, that the filtration step was not employed by the process of the IL reference. Additionally, Applicants note that the filtration process seemed *a priori* not to provide the desired result and thus its usefulness was not tested immediately. However, Applicants found this filtration step

useful for producing a different extract with increased activity from that of the IL reference.

Clearly, the recited processes provide an extract having the advantages described in the specification. The process was neither taught nor suggested in the IL reference. In an attempt to provide basis for the objection under 102, the Examiner states (page 4, 2nd paragraph of the Action) that:

...it is inherent that oligosaccharides, short peptides, flavanoid glycosides, fatty acids and triglycerides are present in the composition of IL since the composition of IL was made the same way as applicant's was, applicants even admit this on page 18, example 1 of the instant specification.

Applicants respectfully, disagree with the Examiner. The presently claimed process differs greatly from that disclosed in the IL reference. The mere statement that the Examiner refers to in page 18 of the specification reads: "[t]he ACPE utilized in the compositions of the present invention may be prepared, for example by the method of Israel Patent No. 120929 or by the process of the present invention..." ***The two processes are not said to be identical or similar.*** The statement merely referred to the ability of making compositions comprising the extract of the art or the extract being disclosed in the specification.

Further, the Examiner has included in the rejection claims directed to compositions for use as preservatives. The IL reference does not recite or specifically suggest the option of utilizing an extract such as ACPE as a preservative of, e.g., foods, beverages and cosmetic formulations. Not all chemical or active components having antifungal and/or antimicrobial properties, including those which are marketed as such under various generic names, have been proven effective as preservatives or as

effective therapeutics. Additionally it should be noted that while an agent may have antifungal and antimicrobial activity, it may at the same time be toxic for human use or application.

In fact, Applicants submit that the extract of the IL reference has never been utilized as a preservative or as an active component in a medical formulation. Applicants note that the obvious and most chronologically logical step would have been simply to utilize the extract of the IL reference in the preparation of preservatives or medical formulations. However, due to the effectiveness of the extract in preserving, e.g., foods and cosmetics, a useful preservative was not produced.

Accordingly, Applicants submit that the IL reference does not anticipate, either expressly or inherently, each and every element of amended claims 91, 92, 94, 95, and 105, as required under 35 USC § 102(b). Therefore, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 91, 92, 94, 95, and 105 under 35 USC § 102(b).

IV. At page 4 of the Official Action, claims 91-102, 105, 106 and 113 have been rejected under 35 USC § 102(b) as being anticipated by or, in the alternative, under 35 USC § 103(a) as obvious over the IL reference.

The Examiner has rejected claims 91-102, 105, 106 and 113 under 35 USC § 102(b) as being anticipated by or, in the alternative, under 35 U.S.C. § 103 as obvious over the IL reference. The Examiner asserts that

the instantly claimed extract composition appears to be anticipated by the cited reference.

In the alternative, even if the claimed extract composition is not identical to the referenced extract composition with regard to some unidentified

characteristics, the differences between that which is disclosed and that which is claimed are considered to be so slight that the referenced extract composition is likely to inherently possess the same characteristics of the claimed extract composition. Thus, the claimed extract composition would have been obvious to those of ordinary skill in the art within the meaning of USC 103. Further, if not anticipated, the result-effective adjustment of particular conventional working conditions (e.g., conventional temperatures, heating, pH, etc.) is deemed merely a matter of judicious selection and routine optimization which is well within the purview of the ordinary artisan.

In view of the following, the rejection of claims 91-102, 105, 106 and 113 is respectfully traversed.

Applicants note that claim 113 has been canceled, therefore rendering the rejection of this claim moot.

As stated above in Section III, the test for anticipation is whether each and every element as set forth is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP § 2131.

The IL reference is discussed in section III above. The discussion of the IL reference is incorporated herein by reference. As discussed, the IL reference fails to teach each and every element of the presently pending claims. The IL reference does not teach the process step of filtering the liquid extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. Accordingly, Applicants submit that the IL reference does not anticipate, either expressly or inherently, each and every element of amended claims 91-102, 105, and 106, as required under 35 USC § 102(b).

With regard to the obviousness rejection under 35 U.S.C. § 103, to establish a *prima facie* case of obviousness, the PTO must satisfy three requirements. First, as the U.S. Supreme Court very recently held in *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398 (2007), “a court must ask whether the improvement is more than the predictable use of prior art elements according to their established functions. ...it [may] be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. ...it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does... because inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known.” (*KSR*, 550 U.S. 398 at 417.) Second, the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *Amgen Inc. v. Chugai Pharm. Co.*, 18 USPQ2d 1016, 1023 (Fed. Cir. 1991). Lastly, the prior art references must teach or suggest all the limitations of the claims. *In re Wilson*, 165 USPQ 494, 496 (C.C.P.A. 1970).

Applicants respectfully submit that a *prima facie* case of obviousness has not been established because the cited reference fails to teach or suggest every element of the presently pending subject matter, as required by *In re Wilson*. Additionally,

Applicants submit that the presently claimed process produce a different extract from that of the IL reference.

The presently claimed subject matter, including claims 91 and 105, is discussed in detail above with regard to the previous rejection. The discussion of the presently claimed subject matter is incorporated herein by reference.

Claim 96 is directed to a dermatological composition comprising: (i) an activated citrus peel extract (ACPE) comprising 55% oligosaccharides, 5% short peptides, 20% flavonoid glycosides, 10% fatty acids and 10% triglycerides and (ii) a dermatologically acceptable carrier, excipient or diluent; wherein said ACPE is prepared by an activation method comprising: contacting citrus peels with spores of at least one fungal or bacterial pathogen, said pathogen being a 16 hour to 24 hours old bacteria or a 8 day to 14 day old fungus; incubating said citrus peels; extracting the peels with water, and removing the peels from the aqueous liquid, thereby obtaining an aqueous extract; and filtering said aqueous extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. Claims 97-102 depend, either directly or indirectly, on claim 96.

The IL reference is also discussed in detail above. The discussion of IL reference is also incorporated herein by reference. As discussed, the IL reference does not teach or suggest filtering the liquid extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract, as presently claimed.

In addition to not teaching or suggesting every element of the presently claimed subject matter, Applicants submit that the process of the IL reference and that of claim

91 of the present application make use of “exposure of *citrus peels* to at least one pathogen;” however, the two processes are different. In addition, the two processes produce different products, which have, for example, different activities. The activity of the extract obtained by the method of the present invention (referred to in the specification and herein as ACPE) is greater than the activity of the extract of IL reference. While the activity of the extract of IL reference was exemplified *in vitro*, its use or application in various formulations (suitable, for example, for human applications) has proven difficult for various reasons. Accordingly, Applicants have attempted to improve or perfect the method of extracting ACPE by altering the process steps of extracting ACPE in order to obtain a more effective extract that would produce more effective compositions.

One of the methods which was found beneficial in producing a more effective extract is the method recited in presently pending claim 91. The method recites a filtration step, such as ultrafiltration. It should be noted, that the filtration step was not employed by the process of the IL reference. Additionally, Applicants note that the filtration process seemed *a priori* not to provide the desired result and thus its usefulness was not tested immediately. However, Applicants found this filtration step useful for producing a different extract with increased activity from that of the IL reference.

As was stated on page 20 of the instant specification, the activity of the ACPE of the present subject matter was compared to the activity of the extract obtained according to the method of the IL reference. A serial dilution test showed that the ACPE was 2-4 times as active against various pathogens as was the extract of the IL

reference. Specifically, Example 2 of the present specification states (page 20, lines 8-13) that:

The activity of the ACPE obtained by the process of the present invention was also compared to the activity of the extract obtained by the process of Israel Patent No. 120929. A serial dilution test showed that the ACPE prepared by the method of Example 1 was 4 times as active against *Cladosporium* as was the extract of Israel Patent no. 120929 and twice as active against *E. coli* as compared to the extract of patent no. 120929.

The difference in activity and, particularly, the increase in reactivity towards the indicated pathogens is clearly an indication that not only are the processes different (as was discussed above and as may be evident from the process steps) but also that the extracts obtained by employing the two processes are different.

In contrast to the IL reference, the presently claimed subject matter requires filtering the liquid extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. This additional process step not only makes the process steps different from the IL reference, the extract obtained from this different process is also different as it is more active than that extract of the IL reference.

Accordingly, the IL reference does not teach or suggest every element of the presently claimed subject matter. Further, the extract of the presently pending claims is a more active extract than that of the IL reference and therefore, not identical to the referenced extract composition.

In view of the remarks set forth herein, it is submitted that the cited art does not render the presently pending claims anticipated with the meaning of 35 USC § 102 (b) or, in the alternative obvious within the meaning of 35 USC § 103 (a). Accordingly, the

Examiner is respectfully requested to withdraw the rejection of claims 91-102, 105 and 106.

V. At page 7 of the Official Action, claims 91-102, 105, 106 and 113 have been rejected under 35 USC § 103(a) as being unpatentable over the IL reference.

The Examiner has rejected claims 91-102, 105, 106 and 113 under 35 U.S.C. § 103 as being unpatentable over the IL reference. The Examiner asserts that “[s]ince the applicants admit on the record that the extract claimed is made by the same process as detailed in the instant specification in example 1, then it clearly would have been obvious to make and yield the claimed extract including the amounts of each component (oligosaccharides, short peptides, flavanoid glycosides, fatty acids and triglycerides) since such extractions procedures were well within the purview of the ordinary artisan in an effort to optimize the desired results.”

Applicants respectfully traverse this rejection of pending claims 91-102, 105, 106 and 113. First, a court must ask whether the improvement is more than the predictable use of prior art elements according to their established functions. *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398 (2007). Second, the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *Amgen Inc. v. Chugai Pharm. Co.*, 18 USPQ2d 1016, 1023 (Fed. Cir. 1991). Lastly, the prior art references must teach or suggest all the limitations of the claims. *In re Wilson*, 165 USPQ 494, 496 (C.C.P.A. 1970).

Applicants note that claim 113 have been canceled, therefore rendering the rejection of this claim moot.

Applicants respectfully submit that a *prima facie* case of obviousness has not been established because the cited references fails to teach or suggest every element of the presently pending subject matter, as required by *In re Wilson*. Additionally, Applicants submit that assuming *arguendo*, a *prima facie* case of obviousness were established, it would be obviate as the presently pending claims produce a different extract from that of the IL reference.

The presently claimed subject matter, including claims 91, 96 and 105, is discussed in detail above with regard to the previous rejection. The discussion of the presently claimed subject matter is incorporated herein by reference.

The IL reference is also discussed in detail above. The discussion of IL reference is also incorporated herein by reference. As discussed, the IL reference does not teach or suggest filtering the liquid extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract, as presently claimed.

In addition to not teaching or suggesting every element of the presently claimed subject matter, Applicants submit that the process of the IL reference and that of claim 91 of the present application make use of "*exposure of citrus peels to at least one pathogen*"; however, the two processes are different. In addition, the two processes produce different products, which have, for example, different activities. The activity of the extract obtained by the method of the present invention (referred to in the specification and herein as ACPE) is greater than the activity of the extract of IL reference. While the activity of the extract of IL reference was exemplified *in vitro*, its use or application in various formulations (suitable, for example, for human applications)

has proven difficult for various reasons. Accordingly, Applicants have attempted to improve or perfect the method of extracting ACPE by altering the process steps of extracting ACPE in order to obtain a more effective extract that would produce more effective compositions.

One of the methods which was found beneficial in producing a more effective extract is the method recited in presently pending claim 91. The method recites a filtration step, such as ultrafiltration. It should be noted, that the filtration step was not employed by the process of the IL reference. Additionally, Applicants note that the filtration process seemed *a priori* not to provide the desired result and thus its usefulness was not tested immediately. However, Applicants found this filtration step useful for producing a different extract with increased activity from that of the IL reference.

As was stated on page 20 of the instant specification, the activity of the ACPE of the present subject matter was compared to the activity of the extract obtained according to the method of the IL reference. A serial dilution test showed that the ACPE was 2-4 times as active against various pathogens as was the extract of the IL reference. Specifically, Example 2 of the present specification states (page 20, lines 8-13) that:

The activity of the ACPE obtained by the process of the present invention was also compared to the activity of the extract obtained by the process of Israel Patent No. 120929. A serial dilution test showed that the ACPE prepared by the method of Example 1 was 4 times as active against *Cladosporium* as was the extract of Israel Patent no. 120929 and twice as active against *E. coli* as compared to the extract of patent no. 120929.

The difference in activity and, particularly, the increase in reactivity towards the

indicated pathogens is clearly an indication that not only are the processes different (as was discussed above and as may be evident from the process steps) but also that the extracts obtained by employing the two processes are different.

In contrast to the IL reference, the presently claimed subject matter requires filtering the liquid extract through a membrane having a cutoff of between 800 and 200 Da and concentrating the extract to obtain said activated citrus peel extract. This additional process step not only makes the process steps different from the IL reference, the extract obtained from this different process is also different as it is more active than that extract of the IL reference.

The Examiner continues to states that "...if not anticipated, the result-effective adjustment of particular conventional working conditions (e.g., conventional temperatures, heating, pH, etc.) is deemed merely a matter of judicious selection and routine optimization which is well within the purview of the ordinary artisan." (Official Action, page 5, last paragraph). Applicants respectfully disagree.

The novel process of the present subject matter is clearly novel and not obvious. As a person skilled in the art would appreciate, modification of a working process may not necessarily result in an improvement. Heating below or above certain working temperatures, which the Examiner finds to constitute a conventional working condition, may completely change the course of a chemical or a biological process and may lead to deactivation rather than activation. At times, a small change in the temperature of a biological process may require great modification in the selection of a solvent, catalysts and the purity of the end product. This is particularly true where biological systems are concerned. The process of the invention, as now claimed, requires a selection of steps

which are unique in providing a clearly improved extract. Further to our above comments, we wish also to state that the selection of pathogens of a certain "age" was not a matter of simple modification of the existing process but rather required elaborate experimentation. In fact, the ability to maintain the activity of the specific pathogens under incubation and the ability to separate out material without reducing the activity of the extract, but rather to increase its activity, was clearly not expected.

Accordingly, the IL reference does not teach or suggest every element of the presently claimed subject matter. Further, the extract of the presently pending claims is a more active extract than that of the IL reference and therefore, not identical to the referenced extract composition.

In view of the remarks set forth herein, it is submitted that the cited art does not render the presently pending claims anticipated with the meaning of 35 USC § 102 (b) or, in the alternative obvious within the meaning of 35 USC § 103 (a). Accordingly, the Examiner is respectfully requested to withdraw the rejection of claims 91-102, 105 and 106.

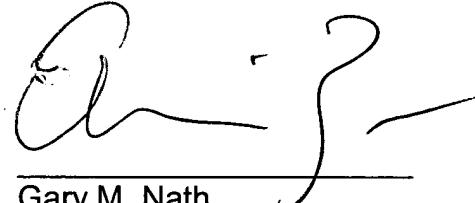
CONCLUSION

In view of the foregoing, Applicants submit that the application is in condition for immediate allowance. Early notice to that effect is earnestly solicited. The Examiner is invited to contact the undersigned attorney if it is believed that such contact will expedite the prosecution of the application.

In the event this paper is not timely filed, Applicants petition for an appropriate extension of time. Please charge any fee deficiency or credit any overpayment to Deposit Account No. 14-0112.

Respectfully submitted,

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